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June 04, 2025

Hon. Nina Morrison
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Abdoulaye Toure v. Officer Chelsea Cassino, Index No. 21-cv-01645

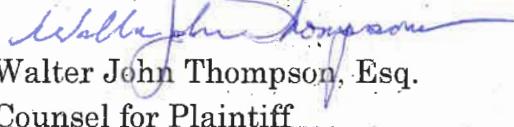
Dear Judge Morrison:

Pursuant to the Court's directive at the May 29, 2025 pre-trial conference, Plaintiff respectfully submits the following proposed description of the case to be read to prospective jurors during voir dire:

This is a civil case brought by Abdoulaye Toure, a Georgia resident, against Port Authority Police Officer Chelsea Cassino. The case arises from an incident at John F. Kennedy International Airport on November 12, 2019, when Officer Cassino and other officers responded to a report from airline staff that Mr. Toure had declared a stun gun and cartridges in his checked luggage. Mr. Toure, who was traveling to Guinea and had conducted research about the legality of his possession, was arrested at the airport for possessing the device. He alleges that the arrest violated his constitutional rights because, at the time, possession of a stun gun for lawful purposes was not a crime under New York law. Officer Cassino denies the allegation and contends that she reasonably believed the arrest was lawful. The jury will be asked to determine whether Mr. Toure's constitutional rights were violated.

Plaintiff has shared this proposed language with Defendant's counsel and, as of the time of this filing, has not received a response or alternative language.

Respectfully submitted,


Walter John Thompson, Esq.
Counsel for Plaintiff

cc: Counsel for Defendant (via ECF)